

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Annual Assessment of the Status of
Competition in the Market for the
Delivery of Video Programming

MB Docket No. 12-203

**COMMENTS OF
Salem Community Television - Town of Salem, NH**

Salem Community Television submits these comments in response to the above captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

Salem Community Television is a Town Public - Educational - Government organization that runs the community media center for the Town of Salem, New Hampshire. We are dedicated to providing the base necessities for functioning community media – physical space, staff, up-to-date equipment, local governance, broad multimedia training

The Town of Salem has one MVPD provider: Comcast provides three cable channels for use by Salem Community Television.

SLC-6 (Salem Learning Channel) - the Educational Channel,
SCTV-17 (Salem Community Television) - the access channel, and
SGC-23 (Salem Government Channel) - for cablecasting local municipal meetings and town government information.

These channels are placed on the lowest tier of cable provided. If residents only have analog television sets they require a digital converter box to receive this basic service.

SCTV has been in operation for almost 42 years, with our first channel starting to cablecast in 1971. In the mid 1980's an educational channel was added, and a government channel completed the PEG Access channels in 2005.

Unfortunately our provider does not allow for distribution of our programming schedule on the system's on-screen program guide. Residents must navigate to our web site to view our programming schedule, though we can provide all necessary data required for inclusion on an on-screen program guide.

SCTV's PEG programming has grown in utilization, viewership, relevance, variety, and quality.

Significant investment in station infrastructure was made following an increase in the franchise fee from 3% to 4% in 2005, allowing physical plant and computer upgrades.

Challenges in the NH legislature to change franchise regulation were defeated, which allowed local municipalities to continue individual negotiations with the cable company. In many cases, state wide boards have been detrimental to PEG access channels, causing many to be disbanded due to lack of leverage on local issue.

In the last 8 years, SCTV has grown to embrace new technologies to become an information hub for the community, integrating programming, social media, and the internet to exchange ideas and information to the surrounding community.

A Video On Demand system was installed in 2006 which allows flexibility to the residents on when shows can be viewed. 3 channels are streamed on the web, so all residents connected to the internet can view the government meetings as they happen.

Salem Community Television reports on local elections, covers local athletics events, parades, reports on municipal projects, creates new and varied programs by our residents, and gives local residents a destination to learn what is going on in their community, and a way for local groups to communicate their message to the rest of the community.

One issue we've been discussing with Comcast is compression of the signal, and signal breakup because of the high level of compression that has been used for the PEG channels. We're in discussions with them to allow a higher bandwidth and HD signal availability, but currently there is no plan in place to allow the higher quality signal our channels send out to be picked up by people at home. Until there is a standard in place with Comcast, we'll continue to be sending a higher quality signal to the Comcast headend than makes it into the home.

PEG Access channels have survived many challenges, but remain a vital link for local groups, families and individuals to communicate with the town and each other. We look forward to new challenges with future technologies and to continue to serve this community for Salem NH, and hope the FCC recognizes the need for our services and helps us achieve these goals for our community.

Sincerely,

Thomas Giarrosso
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9/10/12